#### PRIVACY POLICY AND COOKIES

#### **About:**

This Privacy and Cookie Notice provides information on how Electra collects and processes your personal data when you visit our website or mobile applications.

Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us. Electra is thoroughly committed to protecting the privacy of our site visitors and customers. We fully appreciate and respect the importance of privacy on the Internet. We respect each visitor's and customer's right to personal privacy. To this end, we collect and use information throughout our website only as disclosed in this Privacy Policy.

This policy does not apply to the practices of third-party agents or people of which we do not exercise direct control, employment, or management.

### **Consent:**

By using this site and product, you have consented to our Privacy Policy and that you have the legal capacity to give consent. Otherwise, you may discontinue at this stage.

### Information we collect

We will collect, process, and store personal data only if it is directly provided to us by you. You may do this in your capacity as the user of this Website, by enquiring in relation to our goods or services, becoming a member, or customer

## Use of Demographic and Profile Data

We use your personal information to market to you, we will provide you the ability to opt out of such uses. We use your personal information to resolve disputes; help promote a safe service; measure consumer interest in our products and services, products; detect and protect us against error, fraud and other criminal activity; enforce our terms and conditions; and as otherwise described to you at the time of collection.

Personal information covers any information which relates to you as an identifiable person. Below are examples of the type of data that this may include:

**Identity Data** that includes forenames, last name, date of birth, gender, marital status, and username or similar identifier.

**Contact Data** may include invoicing; purchase order; home or work address, email address and telephone numbers, personal or job title and position.

**Technical Data** may include internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices used to access this Website.

**Profile and Usage Data** may include inquiries submitted by you, feedback and survey responses, and how you use our website, products, and services.

We may also collect non-personal data such as Aggregated Data which is data that may be obtained from your personal data, but which does not directly or indirectly identify you. This may include Usage Data detailing how you use our Website and the product and areas that you have interacted with.

## **Security Precaution**

The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data while you are transmitting it to our site or email address; any such transmission is at your own risk.

We have put in place security measures to prevent your data from accidental loss or disclosure. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorized access. However, please bear in mind that we cannot guarantee that the internet in itself is 100% secure and so we cannot take responsibility for the illegal acts of hackers as long as we have taken the necessary precautions. You should only access our site or services through and within a secure environment. Most importantly, you are responsible for keeping your User ID and password secure and you should not disclose them to anyone.

#### **Data Collection**

A range of different methods may be used to collect data which may include the following methods:

**Direct interactions** with us in person, by post, phone, email or otherwise. You may give us your Identity, Contact.

**Automated technologies or interactions** with our website, by using the inquiry form, by signing up on our platform, or by purchasing Electra products through our website. You may give us Identity, Contact and other relevant information

Third parties or publicly available sources (third parties may be used in processing Identity, Contact and Financial categories of personal data).

# **Data accuracy**

It is important that the data that we hold about you is accurate and up to date. In the event that your data changes, please notify us so that we can update our records.

### **Cookies**

We use cookies to collect information.

A "cookie" is a small piece of information stored by a Web server on a Web browser so it can be later read back from that browser. Cookies are useful for enabling the browser to remember information specific to a given user.

Electra's cookies do not contain any of your personally identifiable information or private data. We use technology in collecting the information in order to make our Sites and other content or services which we make available to you more interesting and useful. For instance, when you come to one of our Sites via your computer or other media device, we may combine your visitor session information or other information collected through cookies, web beacons and other technical methods with personally identifiable information in order to understand and improve your online experiences and to determine what products, promotions, and services you prefer or are likely to be of interest to you.

## **Governing Principles of Data Processing**

Your personal data on <u>www.electra.ng</u> shall be collected and processed in accordance with legitimate and lawful purposes consented to by you herein, provided that further processing may be done only for archiving, scientific research, historical research, or statistical purposes for public interest in line with extant regulations and laws.

Personal data shall be adequate, accurate, and without prejudice to the dignity of the human person. Personal data shall be stored only for the period within which it is reasonably needed, and shall be secured against all foreseeable hazards and breaches such as theft, cyberattack, viral attack, dissemination, manipulations of any kind; damage by rain, fire, or exposure to other natural elements.

Our data collection shall depict that we owe a duty of care to you.

We shall be accountable in line with extant laws and regulations.

# **Sharing of personal information**

We may share personal information with our other corporate entities and affiliates to; help detect and prevent identity theft, fraud, and other potentially illegal acts; correlate related or multiple accounts to prevent abuse of our services; and facilitate joint or co-branded services that you request where such services are provided by more than one corporate entity. Those entities and affiliates may not market to you as a result of such sharing unless you explicitly opt-in. We may disclose personal information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal processes. We may disclose personal

information to law enforcement offices, third party rights owners, third-party vendors, contractors, and suppliers who perform services for us or on our behalf and require access to such information to do that service, or others in the good faith belief that such disclosure is reasonably necessary to: enforce our Terms or Privacy Policy; or protect the rights, property or personal safety of our users or the general public. Electra will share some or all of your personal information with another business entity should we (or our assets) plan to merge with, or be acquired by that business entity. Should such a transaction occur, the other business entity (or the new combined entity) will be required to follow this privacy policy with respect to your personal information.

### **Data Retention**

<u>electra.ng</u> will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy unless a longer retention period is required or permitted by law. Upon request for account closure, your account will be closed but this closure will not involve the deletion of historical records of the account for the reasons already stated. However, except as may be required by law or law enforcement agents and/or regulators, further processing of the personal information related to the account will cease from the time of closure.

### **Your Privacy Rights**

In certain circumstances as provided under the Nigeria Data Protection Regulation or any other applicable law, you may object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

## \*\*\*\* Electra.ng: info@electra.ng

Our site links to other websites that may collect personally identifiable information about you.

# **Choice/Opt-Out**

Electra provides all users with the opportunity to opt-out of receiving non-essential (promotional, marketing-related) communications from us on behalf of our partners, and from us in general, after setting up an account. If you want to remove your contact information from all website (electra.ng) lists and newsletters, please visit navigate to unsubscribe. In the future, you can unsubscribe by clicking the one-click unsubscribe button located at the bottom of every email.

### **Remedies, Questions and Contact**

Generally, you may contact us on any issue by mail to info@electra.ng

## **Notification of Changes**

Electra reserves the right to make changes and/or updates to this Privacy Policy from time to time, without prior notice, and the latest version on this policy will be posted on our websites. You are advised to view this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on our web pages.